

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re Alexander E. Jones Debtor,	Bankruptcy Case No. 22-33553 (CML) Chapter 11
In re Free Speech Systems LLC Debtor,	Bankruptcy Case No. 22-60043 (CML) Chapter 11

**JOINT NOTICE REGARDING AGREED ORDER ON  
DEBTORS' MOTION FOR APPROVAL OF COMPROMISE AND  
SETTLEMENT UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

**PLEASE TAKE NOTICE** that Alexander E. Jones ("Jones"), Free Speech Systems, LLC ("FSS," and together with Jones, the "Debtors"), and the Texas Plaintiffs<sup>1</sup> (collectively, the "Parties") have reached a consensual agreement to extend the deadline to lift the automatic stay set forth in the *Agreed Order on Debtors' Motion for Approval of Compromise and Settlement Under Federal Rule of Bankruptcy Procedure 9019* (the "Agreed Order") [Dkt. Nos. 374 and 673]. The Parties have agreed that the deadline set for October 16, 2023 at 12:01 a.m. (CST) in the Agreed Order will be moved to December 5, 2023 at 12:01 a.m. (CST) at which time the automatic stay shall lift, unless otherwise extended pursuant to the terms of the Agreed Order, solely to allow pre-trial proceedings and discovery to move forward in the Fontaine Action with no further action required by this Court or the Texas Plaintiffs. If no documented consensual agreement among the parties is reached by February 5, 2024 at 12:01 a.m. (CST), then the automatic stay shall be lifted

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Agreed Order.

with respect to the commencement of trial. All other deadlines established in the Agreed Order shall remain in effect unless otherwise agreed by the Parties.

Dated: October 12, 2023

/s/ Jennifer J. Hardy

**WILLKIE FARR & GALLAGHER LLP**

Jennifer J. Hardy (Texas Bar No. 24096068)  
600 Travis Street  
Houston, Texas 77002  
Telephone: 713-510-1700  
Facsimile: 713-510-1799  
Email: jhardy2@willkie.com

**AND**

Rachel C. Strickland (admitted *pro hac vice*)  
Stuart R. Lombardi (admitted *pro hac vice*)  
Ciara A. Sisco (admitted *pro hac vice*)  
787 Seventh Avenue  
New York, New York 10019  
Telephone: 212-728-8000  
Facsimile: 212-728-8111  
Email: rstrickland@willkie.com  
slombardi@willkie.com  
csisco@willkie.com  
*Bankruptcy Co-Counsel to the Texas Plaintiffs*

/s/ Raymond W. Battaglia

**LAW OFFICES OF RAY BATTAGLIA,  
PLLC**

Raymond W. Battaglia (TX Bar No. 01918055)  
66 Granburg Circle  
San Antonio, Texas 78218  
Telephone: 210-601-9405  
Email: rbattagliaw@outlook.com  
*Counsel to Free Speech Systems, LLC*

**MCDOWELL HETHERINGTON LLP**

Avi Moshenberg (TX Bar No. 24083532)  
1001 Fannin Street  
Suite 2700  
Houston, Texas 77002  
Telephone: 713-337-5580  
Facsimile: 713-337-8850  
Email: avi.moshenberg@mhllp.com

**AND**

**CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, PC**

Jarrold B. Martin (TX Bar No. 24070221)  
1200 Smith Street  
Suite 1400  
Houston, Texas 77002  
Telephone: 713-356-1280  
Facsimile: 713-658-2553  
Email: jarrod.martin@chamberlainlaw.com  
*Bankruptcy Co-Counsel to the Texas Plaintiffs*

/s/ Vickie L. Driver

**CROWE & DUNLEVY, P.C.**

Vickie L. Driver (TX Bar No. 24026886)  
Christina W. Stephenson (TX Bar No. 24049535)  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Telephone: 737-218-6187  
Email: dallaseservice@crowedunlevy.com

**AND**

**JORDAN & ORTIZ, P.C.**

Shelby A. Jordan (TX Bar No. 11016700)  
Antonio Ortiz (TX Bar No. 24074839)  
500 North Shoreline Blvd., Suite 900  
Corpus Christi, Texas 78401  
Telephone: 361-884-5678  
Facsimile: 361-888-5555  
Email: sjordan@jhwclaw.com  
Email: aortiz@jhwclaw.com  
*Counsel to Alexander E. Jones*

**CERTIFICATE OF SERVICE**

I certify that on October 12, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jennifer J. Hardy

Jennifer J. Hardy